



March 15, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the AGI "March Madness/Space Technology Extravaganza" on March 17, 2011

On March 17, 2011, Analytical Graphics Inc. (AGI) will hold a "March Madness/Space Technology Extravaganza" reception at the Pour House/Top of the Hill in Washington, D.C. Over 300 people have been invited to drop by the reception from 12 – 6 p.m., including representatives from Congress, the White House, industry, academia, media, nonprofit organizations (Space Foundation, AIA, STA, NDIA), embassies (DLR, CNES, ISRO, ESA), and Federal agencies (NASA, DOD, State Department, Commerce, and OSTP). The estimated cost of the light refreshments is \$15 - \$17 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further NASA programs and operations. The reception will give NASA employees the opportunity to discuss space technology and space-related matters with other attendees in an informal atmosphere. Accordingly, NASA employees whose duties do not substantially affect AGI, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the AGI event for themselves and an invited guest.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam F. Greenstone